

## REMARKS

Claims 1-18 and 22 through 24 are pending in the application with the present amendments. Claim 1 is amended herein to address the present objection to claim 5. As amended, claim 1 now specifies a range of pH values which encompasses the pH range that is further limited by claim 5. Support for this amendment is provided at paragraphs [0028] and [0029], *inter alia*, and in the original claims. As to claim 9, Applicants do not understand the basis for the objection because the presently presented claim 9 is a simple (not multiple) dependent claim depending from claim 8. Reconsideration and withdrawal of the objections to claims 9-11 are respectfully requested.

In the Office Action, claims 1-3, 5 and 7 through 15 were rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent Publication No. 2004/0127045 to Gorantla et al. ("*Gorantla*"). Claims 6 and 16-18 were rejected under 35 U.S.C. §103(a) as being obvious over *Gorantla* in view of U.S. Patent No. 6,913,517 to Prasad ("*Prasad*"). For the reasons set forth below, Applicants submit that the presently pending claims are fully distinguished from *Gorantla* or the combination of *Gorantla* and *Prasad*. Reconsideration and withdrawal of the rejections are requested.

As recited in claims 1 and 16, a substrate polishing method is provided in which a liquid medium including a carbonate, a stabilizer additive and at least one of an acid and a base is provided to an interface between the first

layer of the substrate and a polishing pad. The substrate or pad is then moved relative to the other to perform polishing.

The rejections cannot stand unless all of the elements are taught by the allegedly anticipatory reference or the combination of references cited to show obviousness. In this case, *Gorantla* neither teaches nor suggests a liquid medium which contains a carbonate. Applicants have thoroughly reviewed *Gorantla* and find no mention of a carbonate therein. No mention of "carbonate" is made in paragraph 25 of *Gorantla*. The listing of bases in paragraph [0044] such as ammonium hydroxide or potassium hydroxide for raising the pH does not teach or suggest the addition of a carbonate to the liquid medium used at the interface between the pad and the substrate being polished.

New claims 22 through 24 specify percentage weight ranges of the carbonate ion to be provided in the liquid medium.

As all of the claims of the application depend from claims 1 or 16, it is submitted that the claims as presented herein are fully distinguished from *Gorantla* and *Prasad*.

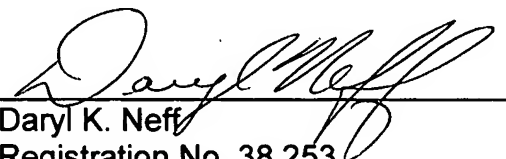
Support for the present amendments is provided, *inter alia*, at paragraphs [0023] through [0028] of the Specification.

Accordingly, Applicants respectfully request reconsideration and allowance of all of the pending claims 1-18 and 22-24 at this time. In the interest of advancing the application to allowance, the Examiner is invited to telephone Applicants' attorney at the number indicated below to discuss or clarify any

remaining matters that relate to the application and/or the present amendment.

This Amendment is submitted with a petition for one-month extension of time, together with a copy thereof. It is believed that no additional fee is due for submission of the present amendment. However, if any such fee is required for this amendment, please debit the Deposit Account No. 09-0458 of the Assignee International Business Machines Corporation. If there is an overpayment, please credit the same account.

Respectfully submitted,  
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